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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

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11 UNITED STATES OF AMERICA, ) 2:12-mj-483-CWH  
12 Plaintiff, ) No.  
13 vs. ) C O M P L A I N T  
14 Louis DIAZ, a.k.a. Luis DIAZ, ) [Title 21 USC 841 (a) (1): Distribution  
15 a.k.a. Joseph Brian CAMACHO, ) of a Controlled Substance,  
16 a.k.a. Daniel Alejandro DOMINGUEZ, ) Title 21 USC 841 (a) (1), and Possession  
a.k.a. Daniel TREV, ) with Intent to Distribution of a  
a.k.a. Victor DIAZ-CERVANTES, ) Controlled Substance]  
17 Defendant. )

18 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
19 complainant, being duly sworn, deposes and states:

20  
21 **COUNT 1**

22 **(Distribution of a Controlled Substance)**

23 On or about July 5, 2012, in the Federal Judicial District of Nevada, Louis DIAZ, the  
24 defendant, did knowingly distribute approximately 234 gross grams of a mixture and a substance  
25 containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United  
26 States Code, Section 841 (a) (1).

## COUNT 2

**(Possession With Intent to Distribute a Controlled Substance)**

On or about July 18, 2012, in the Federal Judicial District of Nevada, Louis DIAZ, the defendant, did knowingly possess with the intent to distribute approximately 903.4 gross grams of a mixture and a substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1).

Complainant, as a Special Agent with the Drug Enforcement Administration, states the following as and for probable cause:

1. I am a special agent with the DEA and have been so employed for approximately fourteen years. I am currently assigned to the DEA'S Las Vegas, Nevada District Office and the Southern Nevada Joint Methamphetamine Task Force. This task force is currently comprised of narcotics investigators from the DEA and the Las Vegas Metropolitan Police Department (LVMPD). The Southern Nevada Joint Methamphetamine Task Force was designed to target individuals and groups involved in the manufacture and distribution of methamphetamine in Clark County, Nevada. Prior to being employed by the DEA, I was employed for approximately two and one-half years as a United States Border Patrol Agent. As a Border Patrol Agent I was cross-designated to make federal arrests of individuals in violation of Title 21 of the United States Code. For more than seventeen years, I have had the authority to make federal drug arrests.

2. As a Special Agent of the DEA, I have participated in hundreds of narcotics investigations involving various types of controlled substances. I have received substantive advanced training pertaining to the investigation of various crimes which arise from narcotics trafficking, including money laundering, the use of interstate transportation in the furtherance of narcotics trafficking, the use of the United States Postal Service facilities in furtherance of narcotics trafficking, and the use of telecommunications facilities in the furtherance of narcotics trafficking. I have participated in investigations involving the purchase of controlled substances from suspected narcotics traffickers using both undercover narcotics investigators and confidential sources. I have participated

1 in the drafting and execution of search warrants for narcotics, the proceeds from the sale of narcotics,  
2 documentary evidence of narcotics trafficking, and for the telecommunications devices used by  
3 narcotics traffickers. I have conducted surveillances in connection with narcotics investigations. I  
4 have authored five affidavits supporting federal wire and electronic intercepts of known and suspected  
5 narcotics traffickers.

6       3. Through the course of these investigations, I have personally interviewed  
7 confidential sources and other persons involved in the distribution of illegal narcotics. I have also  
8 interviewed persons arrested for the distribution of illegal narcotics. I have spoken with more  
9 experienced narcotics investigators with whom I have worked concerning the practices of narcotics  
10 traffickers and the best investigative methods to use when conducting investigations of narcotics  
11 trafficking organizations. Through the course of my investigations and through my conversations with  
12 more experienced narcotics investigators, I have become familiar with the methods and means utilized  
13 by persons who participate in the illegal distribution of controlled substances.

14       4. The following is based on my own investigation or was provided to me by other  
15 law enforcement officers.

16       5. I have not included every fact known to me concerning this offense. I have set  
17 forth only the facts that I believe are essential to establish the necessary foundation for this complaint.

18       6. On May 17, 2012, investigators assigned to the Southern Nevada Joint  
19 Methamphetamine Task Force initiated an investigation of a mid-level methamphetamine trafficker  
20 known as "Jose". Subsequent investigation revealed that "Jose" worked with a second  
21 methamphetamine trafficker who was subsequently identified as Louis DIAZ. This investigation was  
22 initiated based upon information provided by a DEA confidential source. This confidential source has,  
23 in the past, provided law enforcement with information which was later corroborated through  
24 independent investigation. This confidential source is considered reliable.

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1           7.     On June 5, 2012, arrangements were made through a series of undercover  
2 telephone calls between the above mentioned confidential source and Jose, for the confidential source  
3 and a business associate, Task Force Officer Ravelo, acting in an undercover capacity, to meet with  
4 Jose for the purpose of negotiating the purchase of eight ounces of methamphetamine from Jose.

5           8.     At approximately 2:00 p.m., plans were made at the Las Vegas District Office  
6 for Task Force Officer Ravelo and the confidential source to meet with Jose at the Food 4 Less grocery  
7 store located on the northeast corner of the intersection of Pecos Road and Bonanza Road in Las  
8 Vegas, Nevada to purchase the above mentioned eight ounce of methamphetamine.

9           9.     At approximately 4:30 p.m., investigators assigned to the Southern Nevada  
10 Joint Methamphetamine Task Force established surveillance in the parking lot of the above mentioned  
11 Food 4 Less grocery store located at the intersection of Pecos Road and Bonanza Road.

12           10.    At approximately 5:00 p.m., DEA Task Force Officers Timothy Beck, Stephen  
13 Balonek, Paul DeAngelis, and Your Complainant observed Task Force Officer Ravelo and the  
14 confidential source arrive at the above mentioned meet location and park near the gas pumps, next to  
15 the McDonald's restaurant.

16           11.    At approximately 5:05 p.m., the above mentioned investigators observed a  
17 young medium complexioned male, later identified as Louis DIAZ, arrive at the meet location driving  
18 a gray 2002 Chevrolet S-10 pick-up truck, bearing Nevada license plate 569YBC, registered to  
19 Vicente TOBON-DUARTE at 2023 Bassler Street, apartment 8, in North Las Vegas, Nevada, and park  
20 near where Task Force Officer Ravelo had parked. Task Force Officers Beck and Balonek  
21 subsequently observed Task Force Officer Ravelo speak with DIAZ through DIAZ' open passenger  
22 window.

23           12.    Task Force Officers Beck and Balonek subsequently observed Task Force  
24 Officer Ravelo get into DIAZ' truck.

25           . . .  
26           . . .

1           13. After a brief meeting, Task Force Officer Ravelo got out of DIAZ' truck and  
2 then back into his vehicle. Investigators subsequently observed Task Force Officer Ravelo leave the  
3 area.

4           14. According to Task Force Officer Ravelo, during his meeting with DIAZ, he  
5 purchased approximately 234 gross grams of suspected methamphetamine from DIAZ for \$8,800.00  
6 in officially advanced funds.

7           15. At the DEA's Las Vegas District Office, Task Force Officer Ravelo conducted  
8 a presumptive field test on a sample which was taken from the suspected methamphetamine purchased  
9 from DIAZ on July 5, 2012. The sample subsequently tested positive for the presence of  
10 methamphetamine.

11           16. On July 18, 2012, arrangements were made through a series of undercover  
12 telephone calls between the confidential source and Jose, for Task Force Officer Ravelo, acting in an  
13 undercover capacity, to meet with Jose for the purpose of purchasing approximately two pounds of  
14 methamphetamine.

15           17. At approximately 9:30 a.m., plans were made at the Las Vegas District Office  
16 to surveil the planned meeting between Task Force Officer Ravelo, acting in an undercover capacity,  
17 and Jose at the Food 4 Less grocery store located on the northeast corner of the intersection of Pecos  
18 Road and Bonanza Road in Las Vegas, Nevada.

19           18. At approximately 11:00 a.m., investigators assigned to the Southern Nevada  
20 Joint Methamphetamine Task Force established surveillance in the parking lot of the above mentioned  
21 Food 4 Less grocery store. At approximately the same time as investigators were establishing  
22 surveillance at the Food 4 Less, the confidential source was talking to Jose on Snug Harbor Street.  
23 According to the confidential source, Jose had agreed to sell two pounds of methamphetamine to Task  
24 Force Officer Ravelo for \$25,000.00. However, he was uneasy about transporting such a large amount  
25 of methamphetamine to the meet location. Reluctantly he agreed to send his "guy" with the  
26 confidential source, in the confidential source's truck, with the methamphetamine.

1           19. At approximately 11:25 a.m., Task Force Officer DeAngelis observed the  
2 confidential source (driver) and DIAZ (front passenger) depart the area of Snug Harbor Street  
3 traveling west on Washington Avenue.

4           20. A short time later, the confidential source reported that Jose had second  
5 thoughts concerning the planned methamphetamine transaction and had contacted DIAZ and ordered  
6 him to return with the methamphetamine. Your Complainant observed DIAZ jump out of the  
7 confidential source's truck as it came to an abrupt stop on Pecos Road. Your Complainant  
8 subsequently observed DIAZ run across Pecos Road, eastbound towards Harris Avenue, carrying a  
9 gray cloth bag. Following a short foot chase, DIAZ was taken into custody. An examination of the  
10 gray cloth bag revealed that it contained approximately 903.4 gross grams of suspected  
11 methamphetamine. As a result, investigators arrested DIAZ on federal drug charges related to  
12 methamphetamine trafficking

13           21. Your Complainant recovered the suspected methamphetamine at the scene and  
14 subsequently transported it back to the DEA's Las Vegas District Office. At the DEA's Las Vegas  
15 District Office, Task Force Officer Ravelo conducted a presumptive field test on a sample which was  
16 taken from the suspected methamphetamine that was seized from DIAZ on July 18, 2012. The sample  
17 subsequently tested positive for the presence of methamphetamine.

18           22. At the DEA's Las Vegas District Office, DIAZ identified himself as Joseph  
19 Brian CAMACHO, born in Oakland, California on September 23, 1980. However, an examination  
20 of his fingerprints identified the arrestee as Louis DIAZ, born in Mexico on October 28, 1976. DIAZ  
21 was previously arrested making additional false claims to U.S. citizenship, alien smuggling, burglary,  
22 battery on a police officer/emergency personnel, and taking a vehicle without the owner's consent.  
23 DIAZ pled guilty to this last felony charge and was sentenced to three years of probation.

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1                   23. After being advised of his Miranda rights, DIAZ agreed to speak with  
2 investigators. After initially lying about his identity, DIAZ finally admitted to being Louis DIAZ and  
3 to having delivered the half-pound of methamphetamine to Task Force Officer Ravelo on July 5, 2012  
4 and to having attempted to deliver the two pounds of methamphetamine to Task Force Officer Ravelo  
5 on July 18, 2012. However, DIAZ was unwilling or unable to provide any additional information  
6 concerning Jose.

Christopher Cadogan, Special Agent  
Drug Enforcement Administration

13 SUBSCRIBED and SWORN to before me  
this 1<sup>st</sup> day of July, 2012.

~~UNITED STATES MAGISTRATE JUDGE~~